

Michigan Home and Community-Based (HCB) Settings Transition Plan – MI Choice Waiver

| Section 1: Assessment | | | | | |
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| Action Item | Description | Start Date | End Date | Sources | Key Stakeholders |
| Identify all provider controlled and owned residential and non-residential settings and any individuals who will be affected by changes. | MDCH will work with MI Choice waiver agencies (PAHPs) to compile a list of all settings currently used within the MI Choice waiver. | 7/1/2014 | 11/30/2014 | Waiver agency provider networks, waiver agency participant lists | MDCH Medicaid LTC Division: HCBS Section (HCBSS) and LTC Policy section, MI Choice waiver agencies |
| Review state policies, procedures and standards | State will review current policies, procedures, standards and contracts to determine required revisions to adhere to new rule (including credentialing, licensing, training curricula, etc). Stakeholder review and input will also be included in this step. | 9/1/2014 | 12/31/2014 | Licensing standards of AFCs and HFAs, provider contracts, MI Choice and LOCD policies, provider monitoring protocols | HCBSS, LTC Policy, LARA, MI Choice waiver agencies, provider network, MI Choice participants, Quality Management Collaborative (including participant representatives from both the aging and disabled populations) |
| Submit MI Choice Waiver Amendment | Submit Waiver Amendment and modified transition plan to CMS following public comment period. | 9/30/2014 | 9/30/2014 | CMS Waiver Document, HCB Settings Transition Plan | HCBSS, LTC Policy, MI Choice waiver agencies, provider network, Quality Management Collaborative, MI Choice participants |
| Develop statewide assessment tool | MDCH will develop a tool as guided by the CMS Exploratory Questions Tool and vetted by key stakeholders for MI Choice waiver agencies to evaluate conformity to and compliance with HCBS rules. | 10/1/2014 | 11/30/2014 | CMS Exploratory tool, state developed assessment tools | HCBSS, LTC Policy, MI Choice waiver agencies, Quality Management Collaborative |
| Have all HCBS settings assessed by MI Choice waiver agencies | MI Choice waiver agencies contract directly with providers. Waiver agencies will be required to conduct on-site assessments of each provider setting to determine compliance to new rule or need for | 10/1/2014 | 9/30/2015 | Assessment tool, Input from providers | MI Choice waiver agencies, provider network, HCBSS |

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| | corrective action. This will include collecting feedback from participants. MDCH will oversee the process. Waiver agencies will report this data to MDCH. | | | | |
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| Section 2: Remediation | | | | | |
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| Action Item | Description | Start Date | End Date | Sources | Key Stakeholders |
| Update state policies, procedures, standards, contracts as necessary | State will develop revised policies, procedures, standards and contracts to address ongoing compliance and monitoring, including adding requirement of using assessment tool as part of provider monitoring. | 1/1/2015 | 6/30/2015 | MDCH staff, MI Choice policy, MI Choice contracts, Monitoring tool | LARA, MI Choice waiver agencies, provider network, LTC Policy, HCBSS |
| Incorporate Education Compliance Understanding into Provider Enrollment | Require waiver agencies, in contract, to ensure that all new providers are assessed for HCB settings prior to providing services. When agencies enroll to provide HCBS, they will be provided technical assistance on HCB setting requirements. | 1/1/2015 | 6/30/2015 | Provider monitoring tool and instructions | HCBS, MI Choice waiver agencies, provider network |
| Ongoing monitoring of compliance | MDCH will incorporate HCB settings requirements into quality reviews, provider monitoring, and consumer satisfaction surveys to identify areas of non-compliance. | 1/1/2015 | 6/30/2015 | Administrative Quality Assurance Reviews, Provider Monitoring Tool, Participant Satisfaction Survey | HCBS, MI Choice waiver agencies, provider network, participants |

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| Compile and analyze assessment data | MDCH will work with MI Choice waiver agencies to compile a list of all assessment findings to determine providers who meet, do not meet, and could come into compliance with HCB Settings rules. | 5/1/2015 | 12/31/2015 | Assessment tool responses, MI Choice waiver agencies | HCBS, MI Choice waiver agencies, provider network |
| Notify providers who do not and cannot meet the Federal requirements. Notify any effected participants of these providers. | Notify providers who are found to not meet and are unable to meet the Federal requirements. These providers will be removed from the program. Participants will also be notified that their provider cannot meet requirements. | 5/1/2015 | 12/31/2015 | Assessment tool responses | HCBS, MI Choice waiver agencies, provider network, MI Choice participants |
| Notify CMS of any presumptively non-home and community-based settings that do have qualities of home and community-based settings for heightened scrutiny | MDCH will provide justification/evidence to CMS to show that these settings do not have the characteristics of an institution and do have the qualities of home and community-based settings. | 5/1/2015 | 12/31/2015 | Assessment tool responses | HCBS, MI Choice waiver agencies, provider network, CMS |
| Provider Individual Remediation | For those providers who do not comply with the Federal requirements and will require modifications, providers will self-disclose remediation plans or state will preset remediation requirements for each organization's HCB settings. Providers will be required to submit periodic status updates on remediation progress to MI Choice waiver agencies who will forward information to the MDCH. The state | 5/1/2015 | 12/31/2015 | Revised policies and procedures, remediation plans | HCBS, MI Choice waiver agencies, provider network, CMS |

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| | will allow reasonable timeframes for large infrastructure changes with the condition that the providers receive department approval and provide timely progress reports on a regular basis. Updates provided to CMS as needed. | | | | |
| Provide choice to participants to ensure they use settings that meet HCB settings requirements. | Provide choice to participants in provider controlled and owned residential settings to transition to a non-HCBS program or find a new residential or non-residential setting that meets requirements. | 1/1/2016 | 12/31/2016 | Provider network listings, Assessment data, | MI Choice waiver agencies, Participants |

| Section 3: Outreach and Engagement | | | | | |
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| Action Item | Description | Start Date | End Date | Sources | Key Stakeholders |
| Initial Stakeholder Meeting to begin development of statewide plans | Initial meeting to share information across programs and gather initial concerns. | 8/12/2014 | 8/12/2014 | CMS written guidance, MDCH staff, data analysis | MI Choice waiver agencies, HCBS providers, MI Choice participants, HCBSS, LTC Policy |
| Public Notice – Transition Plan | MDCH will notify stakeholders that a draft transition plan has been developed to address new rule and will include links to the full plan and the waiver amendment document. Notices include website posting, newspaper and mailings. | 8/26/2014 | 9/26/2014 | Draft transition plan, waiver amendment document, MDCH website, policy L-letter, newspaper | MI Choice waiver agencies, HCBS providers, MI Choice participants, MSA policy and publications, HCBSS, LTC Policy |
| Public Comment – Transition Plan | MDCH will collect public comments on the draft transition plan through multiple methods including email, US mail and stakeholder meetings. | 8/26/2014 | 9/26/2014 | Email comments, US mail comments, meeting minutes, | MI Choice waiver agencies, HCBS providers, MI Choice participants, MSA policy and publications, HCBSS, LTC Policy |

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| | MDCH will make appropriate changes to the plan and will post comments and responses on the MDCH website >> Health Care Coverage >> Home and Community-Based Services Program Transition. | | | MDCH website. | |
| Revise Transition Plan and post | MDCH will incorporate appropriate changes to Transition Plan based on public comments and post rationale for substantive change to the plan. The plan and comments will be available on the MDCH website >> Health Care Coverage >> Home and Community-Based Services Program Transition. | 9/26/2014 | 9/30/2014 | Draft transition plan, modified transition plan, public comments notes and responses, MDCH website. | HCBS, LTC Policy |
| Public Notice – Assessment results/report | MDCH will present the results of the assessment data to stakeholders and post results, including providers who meet, do not meet, and could come into compliance with HCB Settings rules. | 6/1/2015 | 7/31/2015 | Assessment tool, data analysis, MDCH website, policy L-letter, newspaper | MI Choice waiver agencies, HCBS providers, MI Choice participants, MSA policy and publications, HCBS, LTC Policy |
| Assessment Results and Report Presentation | MDCH will formally present the results of the assessment data (including providers who meet, do not meet, and could come into compliance with HCB Settings rules) to stakeholders and post on relevant websites, including MDCH website >> Health Care Coverage >> Home and Community-Based Services Program Transition. | 7/1/2015 | 8/31/2015 | Assessment tool, data analysis, MDCH website | HCBS, LTC Policy, MI Choice waiver agencies, provider network, Quality Management Collaborative |